



ROJAS  
& OLIVA

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ASSOCIATION

March 13, 2014

The Honorable Sandra L. Townes  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: United States v. Luis Calle-Serna  
Criminal Docket No. 06 CR 091 (S 3) (SLT)

Dear Judge Townes:

The above referenced matter is scheduled for a status conference on March 14, 2014 at 2:30 P.M.. Counsel is respectfully requesting that this matter be reset due to a scheduling conflict and in order to finalize plea negotiations. Accordingly, counsel has conferred with the Assistant United States Attorney, Tyler Smith, Esq., who does not object to the requested continuance of the status conference.

Accordingly, the parties jointly request that the Court adjourn the status conference to April 7<sup>th</sup>, 2014 at 11:00 A.M.. The parties respectfully request that the Court exclude the time from March 14, 2014 through the new status conference date as scheduled by the Court. The parties submit that such an exclusion would serve the ends of justice in this matter and outweighs the best interest of the public and the defendant in a speedy trial pursuant to Title 18, United States Code, Section 3161(h)(7)(A), because it will allow the parties to finalize their disposition of this case. The Government joins in this request.

Respectfully submitted,

Ruben Oliva, Esq.

Cc: Justin Lerer, AUSA  
Tyler Smith, AUSA

ROBERTO  
ROJAS

RUBEN  
OLIVA

FOUNTAIN SQUARE

15800 PINES BLVD.

SUITE 206

PEMBROKE PINES, FL

33027

TEL.

305.373.6868

FAX

305.373.6768

WWW.  
ROJASOLIVA  
.COM

ATTORNEYS  
&  
COUNSELORS  
AT LAW